

Matthew S. Melamed (SBN 260272)
KELLER ROHRBACK L.L.P.
180 Grand Avenue, Suite 1380
Oakland, CA 94612
(510) 463-3900, Fax (510) 463-3901
mmelamed@kellerrohrback.com

Attorney for Plaintiffs

Additional Counsel in Signature Block

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CITY OF RICHMOND AND THE RICHMOND
JOINT POWERS FINANCING AUTHORITY,

Plaintiffs.

V

ROYAL BANK OF CANADA, JP MORGAN CHASE, PUBLIC RESOURCES ADVISORY GROUP, AND THE MAJORS GROUP

Defendants.

No. 3:25-cv-03348-CRB

AMENDED
**JOINT STIPULATION AND [PROPOSED]
ORDER REGARDING CASE
MANAGEMENT DEADLINES**

CITY OF RICHMOND AND THE RICHMOND
JOINT POWERS FINANCING AUTHORITY,
EX REL. DAVID ALESHIRE, CITY
ATTORNEY FOR THE CITY OF RICHMOND,
CALIFORNIA

Plaintiffs,

V.

ROYAL BANK OF CANADA AND JPMORGAN
CHASE & CO.,

Defendants.

No. 3:25-cv-03380-CRB

1 Pursuant to Federal Rule of Civil Procedure 6(b)(1) and Civil Local Rule 6-2, Plaintiffs City of
 2 Richmond and Richmond Joint Powers Financing Authority (collectively, “Plaintiffs”) and Defendants
 3 Royal Bank of Canada and Public Resources Advisory Group (collectively, “Defendants,”¹ and,
 4 together with Plaintiffs, “the Parties”), by and through their counsel, hereby stipulate as follows:

5 WHEREAS, on June 23, 2025, the Court entered the Parties’ Joint Stipulation to Extend
 6 Current Case Deadlines (ECF No. 21);

7 WHEREAS, pursuant to the deadlines established by ECF No. 21, on July 9, 2025, Plaintiffs
 8 filed an amended complaint in this Action (the “Unjust Enrichment Action”) (ECF No. 22); on July 30,
 9 2025, the Parties met and conferred regarding initial disclosures, early settlement, ADR process
 10 selection, and discovery plan; and on July 30, 2025, the Parties filed ADR Certifications (ECF Nos.
 11 23-25);

12 WHEREAS, on August 12, 2025, the Court entered a stipulation staying the remaining case
 13 deadlines established by ECF No. 21 because the City Attorney for the City of Richmond, the
 14 prosecuting authority for Plaintiffs (“Plaintiffs’ Prosecuting Authority”), filed a California False
 15 Claims Act case against Royal Bank of Canada and JPMC based on allegations related to this action
 16 that remained under seal (the “CA FCA Action”), and the parties to the Unjust Enrichment Action
 17 agreed that, once the CA FCA Action was unsealed, they would seek relation of the two actions (ECF
 18 No. 27);

19 WHEREAS, on September 30, 2025, the parties to the Unjust Enrichment Action moved to
 20 relate the CA FCA Action to this case (ECF No. 28);

21 WHEREAS, on October 1, 2025, the Court entered an order relating the CA FCA Action to this
 22 case (ECF No. 30);

23 WHEREAS, the parties to the two actions met and conferred and determined that, since
 24 Plaintiffs’ Prosecuting Authority intended to amend the complaint in the CA FCA Action, the parties
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26
 27 ¹ Though named as a defendant in the caption above, the Amended Complaint, ECF No. 22, no longer
 28 asserts any claims against JPMorgan Chase Bank N.A. (“JPMC”), which is no longer a party to this
 Action. Further, despite numerous attempts, Plaintiffs have not yet been able to effectuate service on
 defendant The Majors Group.

should wait to set further deadlines until after the amendment is filed so that they can confer regarding whether they will stipulate to consolidate the actions and, if so, for what purposes;

WHEREAS, the Court entered a stipulated order providing a deadline of December 5, 2025 for Plaintiffs' Prosecuting Authority to file an amended complaint in the CA FCA Action and a deadline of 14 days after the amended CA FCA Action complaint is filed for the parties to jointly propose new case management deadlines to replace the deadlines in ECF No. 21 that this Court stayed in ECF No. 27 (ECF No. 34);

WHEREAS Plaintiffs' Prosecuting Authority filed an amended complaint in the CA FCA Action on December 5, 2025, the parties conferred regarding new case management deadlines and coordination with the CA FCA action, and the parties stipulated to extend their time to propose new case management deadlines to December 23, 2025 (ECF No. 38);

NOW, THEREFORE, THE PARTIES STIPULATE TO AND PROPOSE the following case management deadlines:

- ~~February 13, 2026~~
~~January 16, 2025~~: Deadline to file Joint Case Management Statement
February 20, 2026 at 8:30 a.m. by video conference
- ~~January 23, 2025~~: Initial Case Management Conference

Submitted this 23rd Day of December, 2025.

KELLER ROHRBACK L.L.P.

By s/ Matthew S. Melamed

Matthew S. Melamed (SBN 260272)
180 Grand Avenue, Suite 1380
Oakland, CA 94612
(510) 463-3900
Fax (510) 463-3901
mmelamed@kellerrohrback.com

Gary Gotto (admitted *pro hac vice*)
KELLER ROHRBACK L.L.P.
3101 North Central Avenue, Suite 1400
Phoenix, AZ 85012
Telephone: (602) 248-0088
Facsimile: (602) 248-2822
Email: ggetto@kellerrohrback.com
rbartels@kellerrohrback.com

1 R. Bradley Miller (*pro hac vice* forthcoming)
2 R. BRADLEY MILLER LAW
3 301 North Alfred Street
4 Alexandria, VA 22314
5 Telephone: (919) 608-0795
6 Email: rbm@rbradleymillerlaw.com

7 David J. Aleshire (SBN 65022)
8 City Attorney
9 Shannon L. Moore (SBN 243634)
10 Chief Assistant City Attorney
11 Kimberly Y. Chin (SBN 271333)
12 Senior Assistant City Attorney
13 CITY OF RICHMOND
14 CITY ATTORNEY'S OFFICE
15 450 Civic Center Plaza
16 Richmond, CA 94804-1630
17 (510) 620-6509, Fax (510) 620-6518
18 daleshire@awaattorneys.com
19 Shannon_Moore@ci.richmond.ca.us
20 Kimberly_Chin@ci.richmond.ca.us

21 *Attorneys for the City of Richmond and the Richmond*
22 *Joint Powers Financing Authority*

23 STRADLING YOCCA CARLSON & RAUTH LLP

24 By s/ Justin Owens
25 JUSTIN OWENS, State Bar No. 254733
26 jowens@stradlinglaw.com
27 JASON DE BRETTVILLE, State Bar No. 195069
28 jdebretteville@stradlinglaw.com

29 STRADLING YOCCA CARLSON & RAUTH
30 LLP
31 660 Newport Center Drive, Suite 1600
32 Newport Beach, CA 92660-6422
33 Telephone: 949 725 4000
34 Facsimile: 949 725 4100

35 *Attorneys for Defendant Public Resources Advisory*
36 *Group*

37 JONES DAY

38 By s/ Matthew J. Silveira

39 Matthew J. Silveira (SBN 264250)
40 (msilveira@jonesday.com)
41 JONES DAY

1 555 California St., 26th Floor
2 San Francisco, CA 94104
3 Telephone: (415) 875-5715

4 Jason Jurgens (pro hac vice forthcoming)
5 jjurgens@jonesday.com
6 Lauri W. Sawyer (pro hac vice forthcoming)
7 lsawyer@jonesday.com
8 JONES DAY
9 250 Vesey Street
10 New York, NY 10281
11 Telephone: (212) 326-3939
12 Facsimile: (212) 755-7306

13 *Attorneys for Defendant Royal Bank of Canada*

14 SULLIVAN & CROMWELL LLP

15 s/Robert A. Sacks
16 Robert A. Sacks (SBN 150146)
17 (sacksr@sullcrom.com)
18 Caleb J. Downs (SBN 346365)
19 (downsc@sullcrom.com)
20 1888 Century Park East
21 Los Angeles, CA 90067
22 Telephone: (310) 712-6600
23 Facsimile: (310) 712-8800

24 Paul H. Lazarow (SBN 311496)
25 (lazarowp@sullcrom.com)
26 SULLIVAN & CROMWELL LLP
27 550 Hamilton Avenue
28 Palo Alto, California 94301
Telephone: (650) 461-5600
Facsimile: (650) 461-5700

29 *Attorneys for Defendant JPMorgan Chase & Co.*
30 *(Defendant only in No. 3:25-cv-03380-CRB)*

1 **PURSUANT TO STIPULATION, IT IS SO ORDERED**

2
3 ~~December 31, 2025~~
4 Date



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The Honorable Charles R. Breyer, Senior District Judge
United States District Court for the Northern District of
California